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Attorneys for GEICO CASUALTY COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NICOLLE JONES PARKER, an individual,

Plaintiff,

v.

GEICO CASUALTY COMPANY, an entity
licensed to do business in Nevada; DOES I-X,
and ROES XI-XX,

Defendants.

Case No. 2:24-cv-02396-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO FIRST AMENDED
COMPLAINT**

Third Request

Plaintiff NICOLLE JONES PARKER (“Plaintiff”), by and through her attorneys of record, and Defendant GEICO CASUALTY COMPANY (“GEICO”), by and through its attorneys of record, hereby file this Stipulation and Order to extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint (ECF No. 27, filed on Aug. 27, 2025). The current deadline for filing the responsive pleading is January 8, 2026. The parties seek a ninety-day (90) extension of that deadline to April 8, 2026.

The parties have good cause to seek an extension of the current deadline for responding to the First Amended Complaint. Specifically, as indicated by the March 21, 2025 Notice of Bankruptcy (ECF No. 20), Plaintiff initiated a bankruptcy action. In the course of the bankruptcy proceedings, the U.S. Bankruptcy Trustee authorized resolution of Plaintiff’s suit against GEICO.

1 Following the previous request for an extension, the U.S. Bankruptcy Trustee awaits the outcome
2 of subrogation with Plaintiff's health insurer. Plaintiff's counsel has received additional information
3 regarding the Defense Health Agency's subrogation efforts and Plaintiff's bankruptcy proceedings
4 are moving forward toward resolution. Therefore, the parties seek another extension of the instant
5 deadline to avoid unnecessary litigation costs being incurred that would affect the debtor's (now the
6 U.S. Trustee's) estate. (ECF Nos. 25 and 26). As such, the parties and their counsel submit that good
7 cause exists for this extension of the responsive pleading deadline.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the parties to
2 extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint from
3 January 8, 2026 to April 8, 2026, thereby allowing for sufficient time for the U.S. Bankruptcy Judge
4 to consider and to approve the settlement.

5 DATED December 17, 2025.

6 McCORMICK, BARSTOW, SHEPPARD,
7 WAYTE & CARRUTH LLP

8 By /s/ Cheryl A. Grames

9 Jonathan W. Carlson

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16 *Attorneys for GEICO Casualty Company*

17 DATED December 17, 2025.

18 LBC LAW GROUP

19 By: /s/ John C. Courtney

20 John C. Courtney

21 Nevada Bar No. 11092

22 723 South 7th Street

23 Las Vegas, Nevada 89101

24 *Attorneys for Plaintiff*

25 **ORDER**

26 **IT IS SO ORDERED.**

27 
28 Hon. Maximiliano D. Couvillier, III
UNITED STATES MAGISTRATE JUDGE

032193-000463 12298670.1

Dated: December 18, 2025